

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OTO ANALYTICS, INC. d/b/a WOMPLY	§	
	§	
Plaintiff,	§	
v.	§	Civil Action No. 3:21-cv-2636-B
	§	
CAPITAL PLUS FINANCIAL, LLC,	§	
CROSSROADS SYSTEMS, INC., ERIC	§	
DONNELLY, BA FIN ORION, LLC d/b/a	§	
BLUEACORN, and BARRY CALHOUN	§	
	§	
Defendants.	§	

**APPENDIX IN SUPPORT OF PLAINTIFF WOMPLY’S MEMORANDUM OF LAW IN
OPPOSITION TO THE BLUEACORN DEFENDANTS’ MOTION TO DISMISS**

Plaintiff Oto Analytics, Inc. d/b/a/ Womply (“Womply”) submits this Appendix in Support of its Memorandum of Law in Opposition to the Blueacorn Defendants’ Motion to Dismiss, as follows:

<u>Document</u>	<u>Page(s)</u>
Declaration of Jason P. Bloom	APP’X 001-003
Exhibit 1, 01/11/2021 Crossroads Press Release	APP’X 004-005
Exhibit 2, 01/12/2021 Dallas Business Journal Article	APP’X 006-007
Exhibit 3, 06/09/2021 Blueacorn Press Release	APP’X 008-009
Exhibit 4, Crossroads Q2 2021 OTC Disclosure Statement	APP’X 010-021
Exhibit 5, 06/27/2021 New York Times Article	APP’X 022-026
Exhibit 6, 07/08/2021 Crossroads Q2 2021 Shareholder Report	APP’X 027-031
Exhibit 7, Crossroads Q3 2021 OTC Disclosure Statement	APP’X 032-043
Exhibit 8, 01/14/2022 ProPublica Article	APP’X 044-051
Exhibit 9, Crossroads Annual Report and Q4 2021 OTC Disclosure Statement	APP’X 052-075
Exhibit 10, About Us – Capital Plus Financial	APP’X 076-077

APPENDIX IN SUPPORT

Declaration of Toby Scammell	APP'X 078-098
Exhibit 1, 04/27/2021 Emails	APP'X 099-100
Exhibit 2, 05/04/2021 Text Messages	APP'X 101-102
Exhibit 3, 05/05/2021 Text Message	APP'X 103
Exhibit 4, 05/06/2021 Text Messages	APP'X 104-106
Exhibit 5, 05/06/2021 Text Message	APP'X 107
Exhibit 6, 05/07/2021 Emails	APP'X 108-110
Exhibit 7, 05/09/2021 Email	APP'X 111-113
Exhibit 8, 05/09/2021 Emails	APP'X 114-16
Exhibit 9, 05/09/2021 and 05/10/2021 Emails	APP'X 117-118
Exhibit 10, 05/10/2021 Text Messages	APP'X 119-120
Exhibit 11, 05/10/2021 Text Message	APP'X 121
Exhibit 12, 05/10/2021 Email	APP'X 122
Exhibit 13, 05/11/2021 Text Message	APP'X 123
Exhibit 14, 05/11/2021 and 05/12/2021 Emails	APP'X 124-126
Exhibit 15, 05/11/2021 Text Messages	APP'X 127
Exhibit 16, 05/11/2021 Emails	APP'X 128
Exhibit 17, 05/11/2021 Text Messages	APP'X 129
Exhibit 18, 05/12/2021 Text Messages	APP'X 130
Exhibit 19, 05/12/2021 Text Messages	APP'X 131
Exhibit 20, 05/13/2021 Text Messages	APP'X 132
Exhibit 21, 05/13/2021 Text Messages	APP'X 133-135
Exhibit 22, 05/14/2021 and 05/15/2021 Emails	APP'X 136-140
Exhibit 23, 05/14/2021 Text Messages	APP'X 141

APPENDIX IN SUPPORT

Exhibit 24, 05/14/2021 Text Messages	APP'X 142-143
Exhibit 25, 05/15/2021 Text Messages	APP'X 144
Exhibit 26, 05/15/2021 Text Messages	APP'X 145
Exhibit 27, 05/16/2021 Text Messages	APP'X 146
Exhibit 28, 05/17/2021 Text Messages	APP'X 147
Exhibit 29, 05/18/2021 Text Messages	APP'X 148
Exhibit 30, 05/18/2021 Text Messages	APP'X 149
Exhibit 31, 05/19/2021 Text Messages	APP'X 150
Exhibit 32, Womply-Blueacorn Agreements	APP'X 151-164
Exhibit 33, 05/10/2021 Slack Chats	APP'X 165
Exhibit 34, 05/18/2021 Slack Chats	APP'X 166-173
Exhibit 35, 05/18/2021 and 05/19/2021 Emails	APP'X 174
Exhibit 36, 06/01/2021 Emails	APP'X 175
Exhibit 37, 06/02/2021 Slack Chats	APP'X 176-177
Exhibit 38, 06/04/2021 Slack Chats	APP'X 178
Exhibit 39, 06/09/2021 Slack Chats	APP'X 179-180
Exhibit 40, 06/24/2021 Email	APP'X 181-184
Exhibit 41, 06/25/2021 Email	APP'X 185-186
Exhibit 42, 07/01/2021 and 07/22/2021 Emails	APP'X 187-191
Exhibit 43, 07/21/2021 Invoice	APP'X 192
Exhibit 44, 08/04/2021 Invoice	APP'X 193
Exhibit 45, 08/13/2021 Signal Messages	APP'X 194
Exhibit 46, 08/18/2021 Notice of Termination	APP'X 195-196
Declaration of Cory Capoccia	APP'X 197-204
Exhibit 1, 05/07/2021 and 05/08/2021 Emails	APP'X 205-211

APPENDIX IN SUPPORT

Exhibit 2, 05/09/2021 Emails	APP'X 212-214
Exhibit 3, 05/09/2021 and 05/10/2021 Emails	APP'X 215
Exhibit 4, 05/10/2021 Emails	APP'X 216-218
Exhibit 5, 05/18/2021 and 05/19/2021 Emails	APP'X 219-220
Exhibit 6, 06/18/2021 Emails	APP'X 221
Exhibit 7, 07/01/2021 and 07/22/2021 Emails	APP'X 222-226
Exhibit 8, 07/21/2021 Invoice	APP'X 227
Exhibit 9, 20 07/22/2021—07/28/2021 Emails	APP'X 228-229
Exhibit 10, 07/29/2021—08/03/2021 Emails	APP'X 230
Exhibit 11, 08/04/2021 Invoice	APP'X 231

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on February 14, 2022, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all known counsel of record.

/s/ Jason P. Bloom
Jason P. Bloom

APPENDIX IN SUPPORT